

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

MICHAEL LEWIS, et al.,)
Plaintiffs,)
v.)
300 WEST LLC, et al.,)
Defendants.)
Case No. 18 CV 50186
Judge Frederick J. Kapala
Magistrate Judge Iain D. Johnston

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE PLEAD BY DEFENDANTS
300 WEST LLC AND MPR MANAGEMENT INC**

NOW COME, Defendants, 300 West LLC (“300 West”) and MPR Management, Inc. (“MPR”), by their undersigned attorneys, Klein, Thorpe and Jenkins, and hereby move this Honorable Court for an extension of time to September 28, 2018 to answer or otherwise plead. In support thereof, 300 West and MPR state as follows:

1. Plaintiffs filed this action on June 6, 2018.
2. 300 West and MPR waived service of process, and their response to the Complaint is due August 7, 2018.
3. On July 12, 2018, this Court granted defendant Arnold Magnetic Technologies Corporation, Arnold Magnetic Technologies Holding Corporation, Compass Group Diversified Holdings LLC, Flexmag Industries, Inc., and The Arnold Engineering Co.'s unopposed motion for an extension of time to respond to the Complaint. Docket No. 18. The deadline for those defendants to respond is now September 28, 2018. *Id.*

4. On August 1, 2018, pursuant to a stipulation filed between Plaintiffs and Defendant Precision Castparts Corp. (“PCC”), the deadline for PCC to answer or otherwise plead was also extended to September 28, 2018.

5. Due to several commitments for 300 West and MPR’s attorneys, including but not limited to certain urgent matters in the State enforcement action related to this matter, and to allow for consistency with the timing for all defendants in this matter to respond, 300 West and MPR request an extension to September 28, 2018 to answer or otherwise plead.

6. Counsel for 300 West and MPR has spoken with counsel for Plaintiffs regarding this request and Plaintiffs do not object.

7. This is 300 West and MPR’s first request for an extension to answer or otherwise plead, and is not brought for any improper purpose or delay.

8. Accordingly, 300 West, MPR and the Plaintiffs stipulate and agree that 300 West and MPR’s deadline to answer or otherwise plead to the Complaint is September 28, 2018.

WHEREFORE, the Defendants, 300 West LLC and MPR Management, Inc. hereby request this Honorable Court grant an extension to September 28, 2018 to answer or otherwise plead, and for such further relief deemed fair and just.

Dated: August 1, 2018

Respectfully submitted,

300 WEST LLC and
MPR MANAGEMENT INC.

/s/ Howard C. Jablecki
One of their attorneys

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